

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

Experimental "Ride-Along")
Classification Change for Periodicals) Docket No. MC2000-1

COX TARGET MEDIA, INC.
AND COX CONSUMER SAMPLING
SECOND INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO POSTAL SERVICE WITNESS HOWARD SCHWARTZ (CC/USPS-T2-12-17)
(November 23, 1999)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Cox Target Media, Inc. and Cox Consumer Sampling, proceeding jointly herein as the "Cox Companies," hereby submit interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,

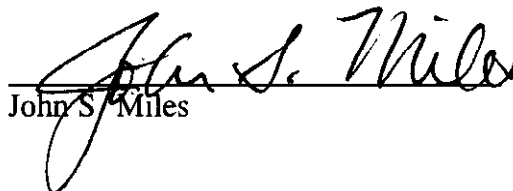


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CERTIFICATE OF SERVICE

I hereby certify that I have this day served by hand delivery or mail the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.


John S. Miles

November 23, 1999

CC/USPS-T2-12.

In your response to CC/USPS-T2-6, you state that

No Conde Nast publication has ever carried two separate inserts in a single edition. In fact, advertisers *have only rarely asked us to carry even one such advertisement*, because of the expense of the postage. (Emphasis added)

- a. Please define the term “rarely” as you use it in this response.
- b. In your response to CC/USPS-T2-5, you define “inundated” as a synonym for “flooded” and state that by the mid-1990s you were “receiving approximately 200 requests per year from advertisers to carry these types of advertisements.” Please reconcile these two responses. In particular, explain how your being “flooded” with requests, at an average rate of about 4 requests per week, is consistent with only “rarely” being asked “to carry even one such advertisement.”

CC/USPS-T2-13.

In response to the hypothetical posed in CC/USPS-T2-6, you state that

In some cases, of course, as, for example, where the two inserts together weighed less than 3.3 ounces, the postage would be calculated using *current* rates (rather than the “ride-along” rate) because this would result in less postage expense. (Emphasis in original)

- a. Please define “current rates” as you use the term here. That is, to which Standard (A) rate schedule (or schedules) are you referring?

- b. Based on Conde Nast's experience, if you had two (or more) inserts whose combined weight were less than 3.3 ounces, what would be the average Standard (A) rate for all inserts combined?
- c. Assuming two such inserts, what would be the average rate per insert?
- d. Assuming three such inserts, what would be the average rate per insert?

CC/USPS-T2-14.

Please refer to your response to CC/USPS-T2-1, in which you state that ten issues of Conde Nast periodicals in seven different publications carried inserts in 1998.

- a. What was the frequency of publication of each of the seven different publications?
- b. What was the weight of each of the 10 inserts?
- c. In view of the fact that you have been "inundated with requests for these types of innovative advertisements" (see your response to CC/USPS-T2-5), what has precluded you from carrying more than one insert in a single issue of a magazine?

CC/USPS-T2-15.

In your response to CC/USPS-T2-7, you refer to "the fact that some inserts are (and will be) engrained in a magazine advertisement and therefore simply could not be mailed alone."

- a. Please define or explain what you mean by the term "engrained" as you use it in your response.

- b. Please cite examples of inserts that are (or have been) engrained in magazine advertisements.
- c. According to your response to CC/USPS-T2-1, ten issues of Conde Nast periodicals carried inserts in 1998. Under your definition of engrained, how many of those ten inserts could be said to have been “engrained” in the advertisements?

CC/USPS-T2-16.

- a. During 1998, what was the maximum number of “eligible” inserts printed on paper stock that was heavier than the stock used to print the pages of the magazine itself (*e.g.*, designed to meet mailing requirements for post cards) that were bound into a single issue of a Conde Nast periodical?
- b. In your opinion, do these “eligible” inserts tend to (i) clutter up a magazine, or (ii) have a negative impact on editorial content, or (iii) distract readers from editorial content, or (iv) lead readers to confuse the single issue with an edition of a catalogue?
- c. If your answer to the preceding question is anything other than unconfirmed affirmative, is there any number of eligible inserts (larger than the maximum number actually put into a Conde Nast publication during 1998) that would have such an effect? If so, in your opinion what would be a threshold range for that number of eligible inserts?

CC/USPS-T2-17.

- a. In your opinion, do “eligible” inserts on heavier weight paper stock that are bound into a magazine either (i) tend to clutter up the magazine, or (ii) have a negative impact on editorial content, or (iii) distract readers from editorial content, or (iv) lead readers to confuse the issue with an edition of a catalogue *any more than* “ineligible” inserts printed on cloth, leather or any other non-paper material?
- b. In your opinion, do “eligible” inserts on heavier weight paper stock that are bound into a magazine either (i) tend to clutter up the magazine, or (ii) have a negative impact on editorial content, or (iii) distract readers from editorial content, or (iv) lead readers to confuse the issue with an edition of a catalogue *any more than* “ineligible” inserts such as packets of hand cream, compact disks, or other similar product samples bound into a magazine?
- c. In your response to CC/USPS-T2-11, you stated that you “do not believe that the inclusion of both a cosmetic product insert and a CD-ROM in a single issue of a magazine would ‘clutter up magazines.’” Is there some number of such inserts that, in your opinion, would clutter up magazines? Realizing that it may not be possible to respond to this question with a single number, please provide a range (your own best estimate) on the maximum number of such inserts that a magazine could contain before you would consider it to be “cluttered up.”